

1 TRACY L. WILKISON
United States Attorney
2 SCOTT M. GARRINGER
Assistant United States Attorney
3 Chief, Criminal Division
NISHA CHANDRAN (Cal. Bar No. 325345)
4 Assistant United States Attorney
General Crimes Section
5 1200 United States Courthouse
312 North Spring Street
6 Los Angeles, California 90012
Telephone: (213) 894-2429
7 Facsimile: (213) 894-0241
E-mail: nisha.chandran@usdoj.gov
8

9 Attorneys for Plaintiff
UNITED STATES OF AMERICA
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11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 SERHAT GUMRUKCU,

17 Defendant.
18
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20

No. 22-MJ-02075

MOTION IN SUPPORT OF GOVERNMENT'S
REQUEST FOR DETENTION AND
OPPOSITION TO DEFENDANT'S MOTION
TO BE RELEASED ON BOND PENDING
TRIAL

Hearing Date: June 15, 2022

Hearing Time: 1:00 p.m.
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Plaintiff United States of America, by and through its counsel of record, the United States Attorney's Office for the Central District of California and Assistant United States Attorney Nisha Chandran, hereby files its motion in support of its request for detention and opposition to defendant SERHAT GUMRUKCU's motion to be released on bond pending trial.

1 This motion and opposition are based upon the attached
2 memorandum of points and authorities, the files and records in this
3 case, and such further evidence and argument as the Court may permit.

4 Dated: June 13, 2022

Respectfully submitted,

5 TRACY L. WILKISON
6 United States Attorney

7 SCOTT M. GARRINGER
8 Assistant United States Attorney
9 Chief, Criminal Division

10 /s/
11 NISHA CHANDRAN
12 Assistant United States Attorney

13 Attorneys for Plaintiff
14 UNITED STATES OF AMERICA
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MEMORANDUM OF POINTS AND AUTHORITIES**I. INTRODUCTION**

Defendant Serhat Gumrukcu poses a significant risk of flight and a danger to potential witnesses, and there are no conditions of release which will reasonably assure his appearance or witness safety. In a case with compelling evidence including co-conspirator testimony, a defendant with significant foreign ties and substantial resources, who is alleged to have committed the instant offense while on pretrial release and who previously fled to avoid trial on a much less serious charge, would likely flee or improperly influence witnesses rather than spend his life in prison or face the death penalty. Accordingly, the Court should order Gumrukcu's detention pending transfer to the charging district.

II. BACKGROUND

On May 19, 2022, a federal grand jury sitting in Burlington, Vermont returned a sealed indictment charging Gumrukcu with murder-for-hire conspiracy with death resulting, in violation of 18 U.S.C. § 1958. The Indictment alleges that Gumrukcu conspired with Berk Eratay and others between May 2017 and February 2018 to cause interstate travel and to use interstate facilities in aid of a plot to pay someone to kill Gregory Davis. In separate, related indictments, the grand jury charged Jerry Banks with kidnapping Davis and charged Aron Ethridge with conspiring to kidnap Davis. The charging documents outline a conspiracy among these four men to have Banks travel to Vermont to murder Davis for money; this goal was successful. The other three co-conspirators have been arrested and are detained pending trial.

1 Gumrukcu was arrested on May 24, 2022, at Los Angeles
2 International Airport. He appeared for his Rule 5 removal to Vermont
3 on May 26, 2022. The government moved for detention. The Court
4 continued the detention hearing until June 2, 2022, and again until
5 June 15, 2022. Gumrukcu has filed a motion for release proposing a
6 substantial bond in an attempt to assure the Court of his appearance
7 and to protect potential witnesses.

8 **III. FACTUAL PROFFER**

9
10 The government's evidence establishes the following
11 relationships among the four charged defendants. Gregory Davis was
12 killed in January 2018 after he was kidnapped from his Vermont home
13 by a person falsely claiming to be a United States Marshal. In the
14 early part of the investigation, law enforcement identified Serhat
15 Gumrukcu as a likely suspect involved in the murder because Gumrukcu
16 and his brother, Murat Gumrukcu, were the only people who appeared to
17 have a serious dispute with Davis or any motive for Davis's
18 execution.

19 In 2017, Davis was threatening the Gumrukcus about going to the
20 FBI with evidence that the Gumrukcus were defrauding him in a
21 multimillion-dollar oil deal the Gumrukcus had entered into with
22 Davis in early 2015. The Gumrukcus failed to perform on the deal and
23 made various claims about their attempts to perform. Davis believed
24 that the Gumrukcus lied to him about various matters. During that
25 same period, Serhat Gumrukcu was facing felony fraud charges in
26 California state court. One aspect of those fraud charges involved
27 bounced checks Serhat Gumrukcu had provided to the middleman in the
28 oil deal, Gregory Gac. On the bounced checks, Serhat Gumrukcu falsely

1 called himself "HRH Prince Serhat Gumrukcu," a reference to His Royal
2 Highness.

3 Also in 2017, Serhat Gumrukcu was in the midst of putting
4 together a different deal through which he obtained a significant
5 ownership stake in a biotech company, Enochian Bioscience. During
6 2017, fraud complaints by Davis would have at least complicated the
7 Enochian transaction, and likely would have scuttled the Enochian
8 deal altogether. Gumrukcu therefore had a strong motive to prevent
9 Davis from reporting yet another fraud. At present, Serhat Gumrukcu
10 appears to own over \$100 million worth of Enochian stock. In May
11 2022, about a week before his arrest, he generated \$2 million in cash
12 from an Enochian stock sale.

13 Neither Serhat nor Murat had traveled to Vermont to personally
14 kill Davis, so the likely plot involved a hired hit man. Murat
15 Gumrukcu, a Turkish resident, visited the United States between
16 December 2017 and March 2018. He stayed at Eratay's former apartment
17 in Las Vegas at the time of the murder. Federal agents executed a
18 search warrant at Eratay's apartment before Murat left the United
19 States. Both Gumrukcus were interviewed in early 2018 about Davis,
20 denying any involvement in the murder. Murat Gumrukcu falsely denied
21 contact with Gac, the middleman in the oil deal, describing the oil
22 deal as his brother's responsibility. Serhat Gumrukcu falsely
23 minimized his involvement in the oil deal. Murat Gumrukcu has not
24 returned to the United States since March 2018.

25 After these interviews, the government investigation entered a
26 long covert stage during which law enforcement sought to identify the
27 hit man. That investigation began to bear fruit in 2020, when Jerry
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1 Banks was identified as a suspect. As described in the attached
2 complaint affidavit, the government's covert investigation built a
3 strong case against Banks. Banks, however, had no relationship with
4 either Gumrukcu or Davis. Thus, the government looked for evidence
5 identifying the middleman or middlemen between Banks and Gumrukcu,
6 and an obvious chain emerged. Banks was close friends with Aron
7 Ethridge; Ethridge was a friend of Eratay; Eratay worked for
8 Gumrukcu.

9 Multiple pieces of evidence emerged to support the conspiracy.
10 Banks met with Ethridge on various occasions in late 2017 as the
11 murder scheme was being finalized. Ethridge was the first person
12 Banks telephoned after the murder. Ethridge did not appear to have
13 direct contact with Gumrukcu, but he had contacts with Eratay. Indeed,
14 the first call Ethridge made after receiving the post-murder call
15 from Banks was to Eratay's phone. Ethridge had no direct connection
16 with Davis; Eratay was the obvious link between Ethridge and
17 Gumrukcu.

18 The government also developed substantial corroboration about
19 Serhat Gumrukcu's financial support for the conspiracy. Eratay's bank
20 records reveal over \$150,000 in wire transfers from Turkish accounts
21 controlled by Gumrukcu between June and October of 2017, as the
22 murder scheme was building. Eratay transformed those funds into cash
23 almost immediately after receiving them. Eratay withdrew the cash in
24 increments of \$9,000, slightly below the \$10,000 currency reporting
25 requirement. Further, Eratay's Google data (obtained by search
26 warrant) shows that he documented personal information about Davis in
27 July 2017, including his full name, date of birth, place of birth,
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1 and cell phone with a Vermont area code.

2 Between 2018 and 2022, the government investigation remained
3 covert. The coconspirators, from Banks to Gumrukcu, likely thought
4 that they had gotten away with murder. In April 2022, the government
5 took its first overt steps. On April 6, 2022, Banks was arrested in
6 Wyoming. During a custodial interview, Banks made a number of false
7 exculpatory statements, including the false claim that he had never
8 been to Vermont. The next day, Ethridge was approached by law
9 enforcement. Although he denied knowledge of any scheme in his
10 initial consensual interview, Ethridge soon reached out to law
11 enforcement to come clean about his role.

12 In a non-custodial and voluntary interview, and prior to being
13 made aware of any of the government's evidence in this case, Ethridge
14 admitted that he was hired by Eratay and Gumrukcu to find someone to
15 murder Davis and that he enlisted Banks to kill Davis. Ethridge
16 admitted receiving over \$100,000 cash and additional Bitcoin as
17 payment for the murder, and sharing these proceeds with Banks.
18 Ethridge's admissions are highly credible - Ethridge has no reason to
19 falsely implicate himself in a murder, which will result in his
20 spending many years in jail, and Ethridge's confession included
21 details that Ethridge could not have known unless he was involved.
22 Ethridge has been indicted and remains detained. The government
23 anticipates that he will be a witness at any trial against Eratay,
24 Gumrukcu, and Banks.

1 **IV. ARGUMENT**

2 **A. Applicable Law**

3
4 Under the Bail Reform Act, 18 U.S.C. §§ 3141 et seq., federal
5 courts are empowered to order a defendant's detention pending trial
6 upon a determination that the defendant is either a danger to the
7 community or a risk of flight. 18 U.S.C. § 3142(e). A finding of risk
8 of flight must be supported by a preponderance of the evidence. See,
9 e.g., United States v. Patriarca, 948 F.2d 789, 793 (1st Cir. 1991);
10 United States v. Jackson, 823 F.2d 4, 5 (2d Cir. 1987); United States
11 v. Chimurenga, 760 F.2d 400, 405 (2d Cir. 1985). A finding of
12 dangerousness must be supported by clear and convincing evidence.
13 See, e.g., United States v. Ferranti, 66 F.3d 540, 542 (2d Cir.
14 1995); Patriarca, 948 F.2d at 792; Chimurenga, 760 F.2d at 405.

15 The Bail Reform Act lists four factors to be considered in the
16 detention analysis: (1) the nature and circumstances of the crimes
17 charged; (2) the weight of the evidence against the person; (3) the
18 history and characteristics of the defendant, including the person's
19 "character . . . [and] financial resources"; and (4) the seriousness
20 of the danger posed by the defendant's release. See 18 U.S.C. §
21 3142(g). Evidentiary rules do not apply at detention hearings, and
22 the Government is entitled to present evidence by way of proffer,
23 among other means. See 18 U.S.C. § 3142(f)(2); see also United States
24 v. LaFontaine, 210 F.3d 125, 130-31 (2d Cir. 2000) (Government
25 entitled to proceed by proffer in detention hearings). Where a
26 judicial officer concludes after a hearing that "no condition or
27 combination of conditions will reasonably assure the appearance of
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1 the person as required and the safety of any other person and the
2 community, such judicial officer shall order the detention of the
3 person before trial." 18 U.S.C. § 3142(e) (1) .

4 **B. Eligibility for Detention**

5 Gumrukcu is eligible for detention because the case involves a
6 crime of violence for which a maximum term of imprisonment of ten
7 years or more is prescribed, see 18 U.S.C. § 3142(f) (1) (A); an
8 offense for which the maximum sentence is life imprisonment or death,
9 see 18 U.S.C. § 3142(f) (1) (B); a serious risk that the defendant will
10 flee, see 18 U.S.C. § 3142(f) (2) (A); and a serious risk that the
11 defendant will obstruct or attempt to obstruct justice, or threaten,
12 injure, or intimidate, or attempt to threaten, injure, or intimidate,
13 a prospective witness or juror, see 18 U.S.C. § 3142(f) (2) (B) .

14 **C. Gumrukcu Poses a Risk of Flight**

15
16 Gumrukcu poses a substantial risk of flight. Indeed, all three
17 statutory factors relating to risk of flight support detention here.

18 1. Seriousness of the Offense Charged

19 The defendant is charged with a crime universally recognized as
20 the most serious offense, premeditated murder. The instant offense
21 carries a penalty of, at a minimum, mandatory life imprisonment. The
22 offense is also death-penalty eligible. The Attorney General has not
23 yet decided whether to seek the death penalty.

24 The possibility of a substantial sentence is a significant
25 factor in assessing the risk of flight. See United States v.
26 Moscaritolo, No. 10 Cr. 4 (JL), 2010 WL 309679, at *2 (D.N.H. Jan.
27 26, 2010) ("[T]he steeper the potential sentence, the more probable
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1 the flight risk is, especially considering the strong case of the
2 government.”) (quoting United States v. Alindato-Perez, 627 F. Supp.
3 2d 58, 66 (D.P.R. 2009)). The very real prospect of Gumrukcu
4 spending the rest of his life in prison provides him with a
5 compelling incentive to flee.

6 2. Strength of the Government’s Case

7
8 The government has already assembled strong evidence during this
9 ongoing investigation. The government has attached the affidavit in
10 support of the complaint authorizing Banks’ arrest, the person hired
11 by Gumrukcu to kill Gregory Davis, Ex. 1, and an April 2022 affidavit
12 in support of a search warrant authorizing a broader search of two of
13 Eratay’s email accounts (this affidavit also incorporates two 2020
14 search warrant affidavits for Eratay’s email account), Ex. 2. Those
15 documents, outlining only part of the government’s case to date,
16 paint a compelling picture.

17 As noted above, the defendant and his brother appear to be the
18 only people with a motive to kill Gregory Davis. The government has
19 assembled an overwhelming case that Jerry Banks acted as the hit man
20 for the murder. Banks’ only connection to Davis is through Ethridge
21 and Eratay to Gumrukcu. Ethridge has admitted that he acted as the
22 middleman between Banks and Eratay, who stated that he was acting on
23 behalf of Gumrukcu. The financial records show that Gumrukcu paid
24 over \$150,000 from his Turkish bank account to Eratay during the
25 conspiracy, which Eratay withdrew in cash. Ethridge admitted that he
26 was paid over \$100,000 in cash from Eratay. Eratay lied to law
27 enforcement about his knowledge of Davis, as shown by the contents of
28 Eratay’s own Google account. In an interview with law enforcement,

1 Gumrukcu falsely minimized his dispute with Davis. During 2017,
2 Gumrukcu was facing multiple due diligence reviews to succeed at
3 closing the Enochian deal, and was facing a criminal prosecution in
4 California courts. He was very motivated to keep Davis from going to
5 the FBI.

6 3. History and Characteristics of the Defendant

7
8 Gumrukcu's history and characteristics also strongly support
9 detention. Multiple aspects of Gumrukcu's history provide evidence
10 that no conditions should satisfy the Court that Gumrukcu would
11 appear for trial.

12 While Gumrukcu has some ties to the United States, he also has
13 substantial ties outside the United States. He is not a United States
14 citizen. And his brother, Murat Gumrukcu, who was also involved in
15 the charged conduct, as well as his immediate family members, all
16 live outside of the United States in Turkey. His only current ties to
17 the United States are his spouse, his house, and his current business
18 ventures involving medical treatment and research. None of those
19 provide a significant anchor for someone facing mandatory life in
20 prison. His spouse could easily live outside the country with the
21 defendant and would presumably rather live with him outside the
22 country than have the defendant spend his life in jail. The
23 defendant's business ventures can fail or succeed without his
24 presence in the United States. Indeed, Enochian's CEO has published a
25 letter to shareholders outlining the company's independence from the
26 defendant. Ex. 3. The defendant's house is an asset he could
27 liquidate or even lose. A house matters little during a life spent in
28 prison. Gumrukcu has access to significant funds to obtain false

1 documents, to remove/mask electronic monitoring devices, to conduct
2 concealed travel, and to generally abscond and fugitate. Common sense
3 suggests that Gumrukcu would hide or flee rather than spend the rest
4 of his life in jail or face the death penalty. Put simply, a wealthy
5 citizen of a foreign country charged with murder should be detained
6 pending trial.

7 Gumrukcu has a documented history of fraud. California state
8 court records show that Gumrukcu engaged in fraud prior to the
9 Enochian deal. He was arrested in early 2017 and charged with
10 multiple felonies involving two different fraud schemes. One involved
11 evidence that in 2014 Gumrukcu defrauded a Turkish investor of almost
12 \$1 million in a real estate investment. Gumrukcu told the investor
13 that he was spending the funds on purchasing and renovating a Los
14 Angeles home, when in fact Gumrukcu was spending the money on other
15 matters. Gumrukcu also provided the investor with bogus documents,
16 supposedly prepared by an attorney. The other alleged fraud scheme in
17 the state case involved bounced checks directly connected to
18 Gumrukcu's dealings with Gac and Davis. Ex. 4 (State's filed summary
19 of evidence). In a post arrest interview, Gumrukcu essentially
20 admitted the housing investment fraud. Gumrukcu was held over for
21 trial on those charges after a probable cause hearing in early
22 October 2017. In early January, just after Davis' murder, Gumrukcu
23 pleaded guilty to one felony charge immediately after making
24 restitution to the Turkish investor and Gac. Under California law,
25 Gumrukcu later successfully modified the felony conviction charge
26 into a misdemeanor.

27 Gumrukcu has a history of fleeing pending charges. Gumrukcu was
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1 arrested in Turkey in 2012 for fraud and fled the country while that
2 criminal case was pending. He has remained outside Turkey since then,
3 avoiding that prosecution. In 2020, he unsuccessfully sought to
4 dismiss the Turkish case from outside the country. In spite of this
5 failure, he chose not to return to face the charges. His flight to
6 avoid a fraud prosecution from his home country and attendant failure
7 to appear provides strong evidence that he would flee to avoid life
8 in prison.

9 Gumrukcu has a history of violating his conditions of release.
10 In early 2017, Gumrukcu was released on substantial bail by the
11 California court. Gumrukcu committed the charged murder for hire
12 while on pretrial release on the California case. If Gumrukcu would
13 kill a potential witness during pretrial release on a state fraud
14 case, he would be willing to flee or obstruct witnesses in this
15 murder case.

16 Gumrukcu appears to have provided false information to this
17 Court about his background. In his motion for release, Gumrukcu
18 represented to the Court that he received an MD and the equivalent of
19 a PhD at First Moscow State Medical University. Defense Memo. at 23.
20 This claim is supported on the Enochian website by Russian documents
21 stating that Gumrukcu's obtained his MD degree in 2006 after having
22 studied in Russia beginning in 2000. Ex. 5. These recent claims,
23 however, are undercut by Gumrukcu's statements about his medical
24 background in 2017 while putting the Enochian deal together. During
25 2017, people working with Gumrukcu asked him to describe his medical
26 background. In an email on June 29, 2017, he described his medical
27 training without any mention of an MD and the equivalent of a PhD
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1 from First Moscow State. Instead, he wrote:

2 Serhat Gumrukcu (MD PhD) has over 10 years of research and
3 practice experience in the field of Personalized and
4 Regenerative Medicine, focusing on innovative treatments
5 using stem cell technologies, biological treatments, cancer
6 immunology and nanoparticle delivery systems. Dr.
7 Gumrukcu's pioneering work has led to multiple breakthrough
8 achievements in the field of stem cell tech technologies
9 focusing on HIV, chronic degenerative diseases,
10 organ/system failures, and cancer immunotherapy. He has
11 recently finished developing a sterilizing HIV cure
12 AGTHERA, which incorporates the principles of bone marrow
transplantation and gene therapy. Along with AGTHERA, his
nanoparticle based protective HIV vaccine HIVMUNE is also
in development by Enochian Biosciences. Dr. Gumrukcu has
studied medicine in Dokuz Eylul University in Turkey and
continued to receive post graduate degrees in comparative
religion and clinical psychology along with his research
studies and practice in Europe and Asia. He is fluent in 7
languages.

13 Ex. 6. The Russian MD records, Ex. 5, also conflict with archived
14 Enochian accounts by Gumrukcu about his training, which state that he
15 studied medicine in Turkey without receiving a degree and then went
16 to Russia in 2004. Ex. 7. This other account also claims that
17 Gumrukcu continued his medical residency in Turkey (not Russia) and
18 that he received his PhD from RUDN University, not First Moscow
19 State. Published on-line sources provide additional details
20 suggesting that Gumrukcu fraudulently obtained his Russian
21 credentials. Ex. 8.

22 Gumrukcu's "medical practices" also demonstrate that he believes
23 himself above the law. The documents submitted by the defense to the
24 Court confirm government information that Gumrukcu has long been
25 involved in "treating" terminally ill patients, including a
26 Pennsylvania civil judgement obtained against Grumrukcu for treating
27 a patient in 2015. Ex. 8 at 20. At the same time, he has acknowledged
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1 that he has never obtained a license to practice medicine in the
2 United States. Publicly available evidence suggests that he never
3 obtained a license to practice medicine in Turkey. A defendant
4 willing to flout medical practice regulations for years would surely
5 ignore a Court's conditions of release.

6 Gumrukcu notes that he has known about the investigation for
7 years but has not fled. Although Gumrukcu was interviewed in 2018,
8 the investigation has been covert for years before several weeks ago.
9 Gumrukcu remained in the dark about the government's intentions and
10 evidence until he was arrested last week, and therefore had little
11 motive to flee. Before his indictment and arrest, he likely thought
12 that he had gotten away with Davis' murder.

13 Finally, Gumrukcu offers a variety of character letters to
14 support his release motion. These character letters provide scant
15 comfort for the Court. Some of the letters point out Gumrukcu's
16 "healing" powers. The defendant's ability to heal, whether true or
17 not, is irrelevant to his risk of flight. Several letters comment on
18 the potential scientific benefits from Gumrukcu's supposed medical
19 inventions. Many of these letters come from individuals with
20 financial connections to Enochian, and these references therefore
21 have a financial stake in Gumrukcu's "successes" since Davis's
22 murder. In any event, Gumrukcu's medical genius, like his "healing"
23 powers, do not diminish the risk of flight. Further, many of the
24 letters provide insufficient information about the depth of writer's
25 knowledge about Gumrukcu. Only a few letters are from people who knew
26 Gumrukcu before 2017 when he got the Enochian deal off the ground. To
27 the extent that the Court decides to credit these unsworn and
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1 uncrossed character letters, it should also then consider the well-
2 sourced, recently published information about Gumrukcu's business
3 past, serial lies, and the potential fraud at Enochian. Ex. 8 and 9.

4 4. Gumrukcu Poses a Danger to the Community

5 Gumrukcu's alleged conduct reflects a substantial danger to
6 potential witnesses in this case. The evidence shows that Gumrukcu
7 hired Banks to kill Davis in order to keep Davis from going to the
8 FBI, with Gumrukcu making a significant cash payment to secure the
9 murder. There is no reason to believe he would not also hire people
10 to kill or otherwise gain advantage in a criminal case such as this
11 one, which carries a penalty of life in prison.

12 **D. Gumrukcu's Proposed Release Conditions**

13
14 Gumrukcu has proffered significant bail in an effort to counter
15 the risk of his flight and the risk to witnesses. Gumrukcu's proposed
16 collateral should not assure the Court of his appearance. The
17 Enochian deal has generated huge financial rewards for Gumrukcu. To
18 the extent that Gumrukcu has access to tens of millions of dollars in
19 Enochian stock, he can stand to lose a few million dollars. No amount
20 of money, even substantial funds, is worth keeping if one is going to
21 spend the rest of his life in jail. Gumrukcu, who earned his millions
22 only in the past few years, would presumably be able to start over
23 again in a foreign country.

24 Gumrukcu includes as proposed collateral the equity in the home
25 of a friend. The Court does not have sufficient information to assess
26 this proposal. The friend's relationship with Gumrukcu is unclear.
27 The equity in the home comes only from the friend. Perhaps the friend
28

1 is willing to lose the house because Gumrukcu will make up the loss.
2 In any event, whatever belief this friend has in Gumrukcu should not
3 override the strong reasons for detention.

4 The Court should find that the proposed condition does not
5 "reasonably assure the appearance of the person as required and the
6 safety of any other person." 18 U.S.C. § 3142(e). The proposed
7 collateral focuses solely on flight. High bail would provide no
8 assurance that Gumrukcu would not participate in a plan to influence
9 witnesses, a plan that might require no travel at all.

10 **V. CONCLUSION**

11 For the reasons set forth above, the government urges the Court
12 to detain Gumrukcu pending his transfer to the District of Vermont.
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